

DECLARATION OF LYNETTE T. STEVENSON

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

Nicole Stewart, Pro Se

Plaintiff,

Lynette T. Stevenson, Pro Se

Intervenor,

v.

U.S. Department of Agriculture, Small Business Administration, et al.,

Defendants.

Case No.: 2:20-cv-00041-DCLC-CRW

**DECLARATION OF LYNETTE T. STEVENSON IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

I, Lynette T. Stevenson, declare as follows:

- 1. Personal Information and Background:**
- 2. My name is Lynette T. Stevenson. I am the owner of **DALS Credit Solutions Co.**, a small, Black-owned business specializing in financial consulting, IT support, and enterprise system integration. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to these facts.**
- 3. DALS Credit Solutions Co.'s Business Qualifications:**

DALS Credit Solutions Co. is a qualified small business under the applicable NAICS codes, meeting all federal requirements to bid on and perform federal contracts. Our services include application technology asset management, enterprise portal applications, and business process optimization. We hold a **CMMC Level 1 certification** and an **SPRS score of 88**, demonstrating our technical and compliance capabilities.

- 4. Harm Caused by Defendants' Actions:**

Defendants' failure to enforce federal procurement laws and their arbitrary actions caused direct and ongoing harm to my business. Specifically:

- a. In January 2021, DALS submitted a joint bid with **Aneu Strategies Group, Inc.** for the **USDA FPAC contract**, valued at \$5 million. Despite meeting all qualifications under FAR 19.502-2(b), the contract was awarded as a sole-source contract to a non-mandatory Alaskan Native Corporation, excluding my business.
- b. DALS applied for inclusion in the **SBA 8(a) program and CDFI certification**, both of which were arbitrarily denied, preventing access to set-aside contracts and funding opportunities.
- c. Defendants' diversion of set-aside contracts to non-small-business entities violated federal procurement regulations and perpetuated systemic inequities in contracting.

5. Financial Losses:

As a direct result of Defendants' actions, DALS has suffered over \$40 million in financial harm, including:

- a. The loss of the \$5 million USDA FPAC contract,
- b. Over \$20 million in missed SBA 8(a) direct award opportunities, and
- c. Denied access to critical funding through CDFI certification and other programs.

6. Irreparable Harm:

Defendants' actions have caused irreparable harm to my business, including:

- a. Loss of revenue, operational stability, and growth opportunities,
- b. Damage to my business's reputation and credibility in the marketplace, and
- c. Exclusion from federal contracting opportunities, which threatens the long-term survival of my business.

7. Urgency of Judicial Intervention:

Immediate judicial intervention is necessary to prevent further harm to my business. I respectfully request that this Court grant Plaintiffs' Motion for Preliminary Injunction to restore fairness and enforce compliance with federal procurement laws.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th of Januear2025 at Milwaukee, WI

/s/ Lynette T. Stevenson, Pro Se



5767 Albany Green
Westerville, Ohio 43081
(717) 421-1445
LS@dalscreditsolutions.com

DECLARATION OF NICOLE STEWART

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

Nicole Stewart, Pro Se

Plaintiff,

Lynette T. Stevenson, Pro Se

Intervenor,

v.

U.S. Department of Agriculture, Small Business Administration, et al.,

Defendants.

Case No.: 2:20-cv-00041-DCLC-CRW

**DECLARATION OF NICOLE STEWART IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

I, Nicole Stewart, declare as follows:

1. Personal Information and Background:

2. My name is Nicole Stewart. I am the former owner of **Aneu Strategies Group, Inc.**, a small business that specializes in project management, enterprise system integration, and procurement consulting. I have personal knowledge of the facts stated in this declaration and, if called as a witness, could and would testify competently to these facts.

3. Aneu Strategies Group's Business Qualifications:

Aneu Strategies Group (ASG) was a qualified small business under the applicable NAICS codes, meeting all requirements to bid for federal contracts under FAR 19.502-2(b) (Rule of Two). ASG provided a range of services, including enterprise system integration, application development, and IT support, making it a competitive and capable candidate for federal contracting opportunities.

4. Harm Caused by Defendants' Actions:

Defendants' failure to enforce federal procurement laws and their arbitrary denials of certifications and funding caused direct financial harm to my business. Specifically:

- a. In January 2021, ASG collaborated with **DALS Credit Solutions Co.**, owned by Lynette T. Stevenson, to bid on the **USDA Farm Production and Conservation Contract (FPAC)**, valued at \$5 million. Despite meeting all qualifications under FAR 19.502-2(b), the contract was improperly awarded as a sole-source contract to a non-mandatory Alaskan Native Corporation.
- b. ASG applied for certifications and program inclusion (e.g., SBA 8(a) program and CDFI certification) but was arbitrarily denied or excluded without explanation.
- c. The failure to enforce the Rule of Two excluded ASG from multiple set-aside opportunities, directly violating *Kingdomware Technologies, Inc. v. United States*, 136 S. Ct. 1969 (2016).

5. Financial Losses:

Due to Defendants' actions, ASG suffered significant financial losses, including:

- a. The \$5 million USDA FPAC contract, which ASG was qualified to perform,
- b. Additional missed contracting opportunities under SBA programs valued at approximately \$20 million, and
- c. The inability to secure CDFI certification prevented access to critical funding for operational growth.

6. Irreparable Harm:

The financial harm caused by Defendants' actions has had lasting impacts on ASG and my professional career. These include:

- a. Permanent damage to my business reputation and ability to compete in federal procurement,
- b. Loss of opportunities to partner on federal contracts, and
- c. Irreparable harm to my livelihood and future business endeavors.

7. Urgency of Judicial Intervention:

Immediate judicial intervention is necessary to prevent further harm to Plaintiffs. Defendants' continued noncompliance with procurement laws and constitutional protections requires this Court's intervention to restore fairness and equity in federal contracting.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of January 2025, at Milwaukee, WI

/s/ Nicole Stewart, Pro Se

Nicole Stewart
1418 N. Cass St.
Milwaukee, WI 53202
(414) 366-2067
neiko@neikostewart.com